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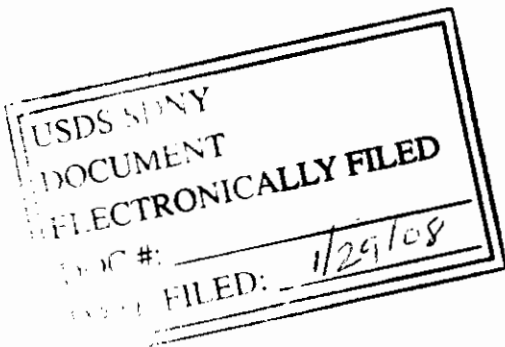
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**MEMO ENDORSED**

January 25, 2008

**BY HAND**

The Honorable Richard J. Sullivan  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 615  
New York, New York 10007

Re: Deval Denizelik ve Ticaret A.S. v. Misrieen Construction Materials, et al.  
07 CV 8662 (RJS)  
Our Ref. No.: 1564.0002

Dear Judge Sullivan:

We represent the Plaintiff in this matter and write to request an additional 120 days to serve the Defendants with a copy of the Summons and Verified Complaint. This is our first request for such relief. The 120-day time limit for service mandated by Fed. R. Civ. P. 4(m) expires on February 1, 2008. While service upon foreign defendants is explicitly exempted from the Rule 4(m) time limit, we make this application in good faith to protect our client's interests.

Plaintiff initiated this action on October 5, 2007, seeking security for its maritime claims via an attachment of the Defendants' property in this district pursuant to Supplemental Rule B. The requested Order for Process of Attachment was signed by Your Honor on October 9, 2007 and subsequently served on New York banks. We have since attached funds to fully secure our claims. Additionally, we promptly notified the Defendants of the fund restraint, as required by Local Rule B.2.

We have also mailed each Defendant a Request for Waiver of Service, none of which has been returned.

Consequently, we have now begun the process of serving defendants in Egypt through judicial channels pursuant to Fed. R. Civ. P. 4(f). However, we are aware that this is a lengthy process that takes several months under the best of circumstances.

**BROWN GAVALAS & FROMM LLP**

The Honorable Richard J. Sullivan  
January 25, 2008  
Page 2

We therefore respectfully request that Plaintiff be granted a 120-day extension of time to serve Defendants with the Summons and Verified Complaint, up to and including May 30, 2008.

We thank the Court for its consideration of this matter.

Respectfully submitted,

**BROWN GAVALAS & FROMM LLP**

  
Peter Skoufalos

Plaintiff's time in which to serve the defendants is extended to April 1, 2008. Plaintiff may seek a further extension, if necessary, prior to the expiration date by separate letter application setting forth the steps taken to effectuate service in this matter as of that date.

SO ORDERED  
Dated: 

1/28/08

RICHARD J. SULLIVAN  
U.S.D.J.